

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

CYPRESS HOLDINGS, III, L.P., individually and
derivatively on behalf of SPORT-BLX, INC.,

Plaintiff,

v.

GEORGE HALL, JOSEPH DE PERIO,
DANIEL STRAUSS, FRANCIS
RUCHALSKI, CESAR BAEZ,
CHRISTOPHER JOHNSON, SPORT-BLX,
INC., SPORT-BLX SECURITIES, INC.,
CLINTON GROUP, INC., and
GLASSBRIDGE ENTERPRISES, INC.,

Defendants.

Civil Action No. 1:22-cv-1243-LGS

**MOTION AND DECLARATION PURSUANT TO LOCAL RULE 1.4
FOR LEAVE TO WITHDRAW AS ATTORNEY OF RECORD**

I, William Alexander Harris, an attorney of record for Sport-BLX, Inc., Sport-BLX Securities, Inc., Clinton Group, Inc., Christopher Johnson, Cesar Baez, and George Hall hereby move the Court pursuant to Local Rule 1.4 for an order, substantially in the form attached hereto as **Exhibit A**, granting me leave to withdraw as attorney of record in this action. In support thereof, and pursuant to 28 U.S.C. § 1746, I declare as follows:

1. Effective as of the close of business on May 18, 2023, I will no longer be associated with Morvillo Abramowitz Grand Iason & Anello P.C. (“Morvillo Abramowitz”), which firm represents Sport-BLX, Inc., Sport-BLX Securities, Inc., Clinton Group, Inc., Christopher Johnson, Cesar Baez, and George Hall in this action.

2. Morvillo Abramowitz, including Jonathan S. Sack, and Edward M. Spiro, will continue to represent the aforementioned parties in this action. Mr. Sack and Mr. Spiro are fully

familiar with the litigation and proceedings to date. Furthermore, additional representation in this case is being provided to Sport-BLX, Inc. and George Hall by Remy Green of the law firm Cohen & Green P.L.L.C.

3. Because the Motion herein will not result in a change of the law firm representing said parties, I respectfully submit that my withdrawal as counsel of record will not affect this action in any way, will not alter the posture of the case, and will not prejudice any party.

4. I am not asserting a retaining or charging lien.

5. For the foregoing reasons, I hereby request that I be removed as counsel of record from the Electronic Case Filing (“ECF”) system, and that no further documents, notices, or other pleadings in this action be served upon me.

6. The filing of this Motion electronically using the Court’s ECF system constitutes good and proper service on all parties and their registered attorneys of record. A copy of this Motion and Exhibit A shall also be provided to Sport-BLX, Inc., Sport-BLX Securities, Inc., Clinton Group, Inc., Christopher Johnson, Cesar Baez, and George Hall.

7. I declare under penalty of perjury that the foregoing is true and correct.

Dated: May 17, 2023
New York, New York

MORVILLO ABRAMOWITZ GRAND
IASON & ANELLO P.C.

By: s/ William Alexander Harris
William Alexander Harris

565 Fifth Avenue
New York, New York 10017
(212) 856-9600 (phone)
(212) 856-9494 (fax)
wharris@maglaw.com